

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

WOMEN OF COLOR FOR EQUAL JUSTICE, et al. and
on behalf of similarly situated individuals,

Plaintiffs,

v.

THE CITY OF NEW YORK, MAYOR ERIC L. ADAMS,
COMMISSIONER ASHWIN VASAN, MD, PHD,
DEPARTMENT OF HEALTH AND MENTAL HYGIENE,
AND DEPARTMENT OF EDUCATION AND DOES 1-20

Defendants

**PLAINTIFFS' NOTICE OF
MOTION FOR SANCTIONS
REGARDING SUBMISSION OF
FALSE STATEMENT OF LAW
AND FAILURE TO CORRECT
AND FALSE STATEMENT OF
FACT**

INDEX No.: 1:22-cv-02234

TO: Elisheva L. Rosen
Assistant Corporation Counsel Office of
Hon. Sylvia O. Hinds-Radix
The City of New York Law Department
100 Church Street
New York, New York 10007
Phone: (212) 356-3522
E-mail: erosen@law.nyc.gov

PLEASE TAKE NOTICE that on the 10th day of July, 2023, Counsel for Plaintiffs filed a Motion for Sanctions (MFS) that includes the Memorandum of Law in Support of Motion for Sanctions (MOL) regarding submission of false statements of law and fact to the Court contained in the Defendants' City of New York Memorandum in Support of its Motion To Dismiss and April 10, 2023 Letter Motion in Opposition - copies of which are attached hereto. Pursuant to Fed.R. Civ. P. 11(c), the draft Motion & MOL were served upon you more than 37 days prior to this date via electronic transmission through the City's service portal, and email.

Counsel will request by Letter Motion that the Court to hear this motion on July 27, 2023 during the Pre-Motion Conference since it is related to the pending motions before the Court.

RESPECTFULLY SUBMITTED,

DATE: July 10, 2023

By: /s/ *Jo Saint-George* _____

Jo Saint-George

Chief Legal Officer

Women of Color for Equal Justice

14216 Dunwood Valley Dr

Bowie MD 20721-1246

Phone: (301) 447-3600

Email: jo@woc4equaljustice.org

CERTIFICATE OF SERVICE

I declare under penalty of perjury that on July, 10, 2023 I served the foregoing Notice of Filing of 1) Plaintiffs Memorandum of Law for Rule 11 Sanctions Regarding Submission of False Statements of law and fact on Defendants Attorney Elisha L. Rosen by electronic mail and U.S. mail, and City mail portal to:

Elisheva L. Rosen
Assistant Corporation Counsel Office
of Hon. Sylvia O. Hinds-Radix
The City of New York Law
Department 100 Church Street
New York, New York 10007
Phone: (212) 356-3522
E-mail: erosen@law.nyc.gov

Dated: 7-10-2023

By: /s/ Jo Saint-George
Jo Saint-George